

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

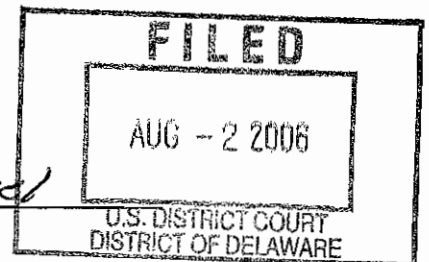
Charles P. Jones,
Plaintiff,

v.

Thomas Corcoran, Alisha Prokaci,
Peter Forbes and Joe Pomella,
Defendants.

Civil Action No.
06-129-KAS

MOTION FOR APPOINTMENT OF COUNSEL



PURSUANT TO 28 U.S.C. 1915 (D), Plaintiff moves for an order appointing Counsel to represent him in this case. In support of this motion Plaintiff states the following:

1. Plaintiff is unable to afford Counsel. He has requested leave in forma pauperis.
2. Plaintiff's imprisonment will greatly limit his ability to litigate.
3. Plaintiff has limited access to the law library and limited knowledge of law.
4. The issues involved in this case are complex and will require significant research and investigations.

5. Due to the Complexity of Scheduling (due to be heard by teleconference on August 18, 2006 at 10:00 am).

6. A trial in this case will likely involve conflicting testimony and Counsel would better enable Plaintiff to present evidence and cross examine witnesses.

7. Plaintiff has made efforts to obtain an attorney to represent him (Please see attached exhibits).

I declare under Penalty of Perjury that the foregoing is true and correct. Wherefore, Plaintiff respectfully request and pray that your Honor please appoint Counsel in this case.

July 27, 2006
Date

Respectfully Submitted,
Charles P. Jones
Charles P. Jones
#00228197
Delaware Corr Center
1181 Paddock Rd.
Smylea, Delaware 19977

Certificate of Service

I, Charles P. Jones, hereby certify that I have served a true

And correct cop(ies) of the attached: MOTION FOR APPOINTMENT OF
Counsel upon the following
parties/person (s):

TO: Warden Thomas Carroll
Delaware Corr Center
1181 Paddock RD
Smyrna, Delaware
19977

TO: Lt. Peter Forbes
Delaware Corr Center
1181 Paddock RD
Smyrna, Delaware
19977

TO: Staff Lt. Alvin Profaci
Delaware Corr Center
1181 Paddock RD
Smyrna, Delaware
19977

TO: Cpl Joe Pamela
Delaware Corr Center
1181 Paddock RD
Smyrna, Delaware
19977

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 27 day of July, 2006

Certificate of Service

I, Charles P. Jones, hereby certify that I have served a true

And correct cop(ies) of the attached: MOTION FOR APPOINTMENT OF
Counsel upon the following

parties/person (s):

TO: Ophelia M. Waters

TO: _____

Deputy Attorney General
Carvel State Office Building
820 N. French Street, 6th Floor
Wilmington, Delaware 19801

TO: _____

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 27 day of July, 2006

WM Charles P. Jones

SBI# 00228192 UNIT F-2

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



Office of the Clerk
United States District Court
844 N. King Street, Lockbox 18
Wilmington, Delaware
19801

U.S.M.S.
X-RAY

GRADY & HAMPTON, LLC

6 NORTH BRADFORD STREET
DOVER, DELAWARE 19904

JOHN S. GRADY
STEPHEN A. HAMPTON
LAURA F. BROWNING

DOVER (302) 678-1265
SUSSEX (302) 855-1313
FAX (302) 678-3544

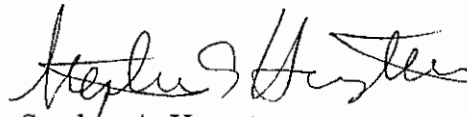
January 12, 2006

Charles Jones
SBI# 00228197
1181 Paddock Road
Smyrna, DE 19977

Dear Mr. Jones:

I am not sure if I will be able to help you with your lawsuit as I do not generally like to take over cases that have been filed by somebody else. However, if you have not filed a medical negligence lawsuit against the health care provider and you believe that lack of proper medical care has caused you serious injury, I would like to know about it. I can at least make sure that the authorities who are investigating Delaware prisons get the information. Whether I can take your medical negligence suit will depend on the facts of the case and the extent of your injury.

Sincerely yours,



Stephen A. Hampton

SAH:rlm

Exhibit "A"

Law Office of
YOUNG, MALMBERG & HOWARD, P.A.
30 The Green
Dover, Delaware 19901
www.youngmalmberg.com

Kevin M. Howard
Khoward@youngmalmberg

Phone: (302) 672-5600
Fax: (302) 672-7336

March 22, 2006

Mr. Charles P. Jones
SBI No. 228197
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Dear Mr. Jones:

Thank you for your letter concerning your claim against the Department of Corrections. I do not practice in the federal court so I am unable to assist you with any lawsuit that has been filed in the Delaware District Court. Accordingly, I must decline to accept your case but I do wish you the best of luck. If you do want to contact other counsel, I think I have already mentioned the name Steve Hampton, Esquire to you. Mr. Hampton, I know, assists prisoners in connection with their injury cases and he may be interested in your case. Another individual that may be interested is Jeffrey Martin, Esquire. Mr. Martin recently represented the correction's employee who was raped and assaulted while at work. He too might have some interest in a case like yours.

Once again, best wishes and I hope you are successful in recovering a substantial amount of money from the Department of Corrections.

Very truly yours,


YOUNG, MALMBERG & HOWARD, P.A.

KEVIN M. HOWARD, ESQUIRE

KMH/bls

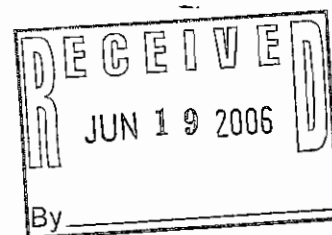
Exhibit "B"

From: Charles P. Jones

#00228197

O. CL
SMYRNA, DC. 19877

We return your original letter
and any docs we received.
No copies kept.



June 11, 2006

Dear Prison Law Office - SAs, Quentin

I am writing to you because on September 12, 2005 I was stabbed in the eye by another inmate that is a mental Health Patient even after telling officers that I have had a previous incident with this inmate and that he keeps threatening to kill me. The institution has charged the other ~~inmate~~ inmate with criminal charges. I have filed a 1983 Complaint in district Court and it has been accepted and the parties have been served. However, I am unskilled in the law and I am in need of some help with my suit. I have had sexual surgeries including a full Retina Rectachment and a Cornea Transplant. I am also blind in the eye now and still have the possibility of the eye having to be removed in the future. I am currently still under the care of doctors at Wills Eye Hospital in Phila. PA. Thank you in advance for taking the time to read and consider this letter. I pray that you and/or your office may be of assistance to me and I look forward

exhibit "C"

To looking back from you one way or
the other, Thank you.

Sincerely,
Frank R. Jones



PRISON LAW OFFICE

General Delivery, San Quentin, CA 94964-0001
Telephone: (415) 457-9144 • Fax (415) 457-9151
www.prisonlaw.com

Director:
Donald Specter

Staff Attorneys:
Susan Christian
Steven Fama
Brittany Glidden
Penny Godbold
Megan Hagler
Alison Hardy
Millard Murphy
Sara Norman
Keith Wattley

June 22, 2006

Re: Request for Legal Assistance

Dear Sir or Madam:

We received your letter, asking for our help, information, or legal advice. Unfortunately, we cannot help you at this time. We receive many more requests than we can possibly handle. We must choose our cases very carefully to ensure that we use our limited resources in the most efficient way.

This means there are going to be many cases that have merit that we cannot pursue, and cases in which we cannot provide requested information or advice. This is unfortunate but necessary, given the large number of cases and requests we handle. We do not like the fact that we can't help everyone who writes. Please understand that our decision not to help does not necessarily mean that you do not have a real problem or worthy case. It is just that we can't help everybody who writes.

To help you determine whether your case is worth pursuing on your own, we have enclosed any self-help material that is relevant to your problem. If no material is enclosed, we do not have any helpful information. You may be able to find useful information in the California State Prisoners' Handbook (3rd Edition) published in 2001. Ask for the Handbook in the prison law library. If you want information on how to order a copy of the Handbook, write to us.

We are sorry that we cannot help you. We hope that in the future we will be able to expand our services to help more prisoners throughout California.

Sincerely,

Prison Law Office

Exhibit "D"

Board of Directors

Marshall Krause, President • Michele WalkinHawk, Vice President
Honorable John Burton • Penelope Cooper • Felecia Gaston • Christiane Hipps • Margaret Johns
Cesar Lagleva • Laura Magnani • Michael Marcum • Ruth Morgan • Dennis Roberts

TO: Julia M. GRAFT
STAFF ATTORNEY
ACLU Delaware
100 WEST 10TH STREET
Wilmington, De. 19801

Charles P. Jones
#00228197
Delaware C.C. Center
Smoking, De. 19977

NO RESPONSE

May 10, 2006

Dear Ms. GRAFT, Esq:

I am writing to you because I was struck in the eye by another inmate on September 12, 2005 while housed in a maximum security unit that I should not have even been in, and after telling officers about threats that were being made against me. The inmate that attacked me is also a mental health patient with extensive amount of time and a very lengthy institutional record for bad and violent behavior.

I am still currently under the care of doctors at Wills Eye Hospital after receiving several surgeries including a Full Retina Reattachment and a Cornea Transplant. I have also just been told recently that the eye still may need to come out and that I would need treatment for the rest of my life for my eye. I am also now blind in this eye.

Exhibit "E"

I have a good case for violation of my 5th, 8th and 14th amendment rights and I have filed a 1983 Civil Rights Complaint in the Delaware District Court. However, I am ignorant to the law and I am in need of some professional help to help me recover damages. I hope and pray that you and/or someone in your office will be able to help me in this matter. I thank you in advance for taking the time to read and consider this letter.

cc: file

Sincerely,
 Charles P. Jones
 Charles P. Jones